

Russell Williams

From: Russell Williams
Sent: Friday, March 15, 2019 4:30 PM
To: Wendy E. Greve
Cc: Eric Buckner; Austin Smith; Tonia Comer; Jayne A. Hudnall
Subject: RE: Settle v. Stepp

Wendy:

Considering our agreed upon delay in matters this week, I will give you until next Friday, March 22, to produce documents responsive to the request below before filing a motion to compel.

Also, please provide dates in the next 3 weeks when you can be available for the depositions of the Healthnet EMS workers (postponed from today) so I can send out new subpoenas.

Thanks – Russell

Russell A. Williams, Esq.



KATZ, KANTOR, STONESTREET, & BUCKNER, PLLC

Your Lawyers, Your voice.

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From: Russell Williams
Sent: Thursday, February 28, 2019 4:04 PM
To: Wendy E. Greve <wgreve@pffwv.com>
Cc: Eric Buckner <ebuckner@kksblaw.com>; Austin Smith <asmith@pffwv.com>; Tonia Comer <TComer@kksblaw.com>; Jayne A. Hudnall <JHudnall@pffwv.com>
Subject: RE: Settle v. Stepp
Importance: High

Wendy:

Please produce documents responsive to Plaintiff's First Requests for Production 6, 7, 8, 9, 10, 20. I have been waiting on these documents for many, many months now (your original responses were served on Octobe2

24, 2018). If these documents are not produced by March 15, 2019. I will have no choice but to file a motion to compel with the court.

If you have questions or would like to discuss this further, please don't hesitate to call.

- Russell

Russell A. Williams, Esq.



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From: Russell Williams

Sent: Tuesday, January 22, 2019 3:40 PM

To: Wendy E. Greve <wgreve@pffwv.com>

Cc: Eric Buckner <ebuckner@kksblaw.com>; Austin Smith <asmith@pffwv.com>; Tonia Comer <TComer@kksblaw.com>;

Jayne A. Hudnall <JHudnall@pffwv.com>

Subject: RE: Settle v. Stepp

Wendy:

Please respond my message below.

Thanks – Russell

Russell A. Williams, Esq.



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From: Russell Williams
Sent: Wednesday, January 9, 2019 5:27 PM
To: Wendy E. Greve <wgreve@pffwv.com>
Cc: Eric Buckner <ebuckner@kksblaw.com>; Austin Smith <asmith@pffwv.com>; Tonia Comer <TComer@kksblaw.com>
Subject: Settle v. Stepp

Wendy:

Please supplement your responses to Plaintiff's Requests for Production 8, 9, and 10.

Also, I plan to subpoena the EMS first responders for depositions. Please let me know some available dates in the next few weeks.

Thanks – Russell

Russell A. Williams, Esq.



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From: Russell Williams
Sent: Tuesday, December 18, 2018 4:34 PM
To: Marilyn Walker <mwalker@pffwv.com>; Gary E. Pullin <gpullin@pffwv.com>
Cc: Jayne A. Hudnall <JHudnall@pffwv.com>; Eric Buckner <ebuckner@kksblaw.com>
Subject: RE: Settle v. Stepp - Discovery Requests

Gary/Marilyn:

Please circulate a proposed protective order (I believe there is one on the S.D.W.V. website). I would like to get one entered ASAP so that you can produce the documents (like Trooper Stepp's personnel file) that are being withheld.

Also, please supplement your responses to Request for Production 8, 9, and 10.

Thanks – Russell

Russell A. Williams, Esq.



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From: Russell Williams

Sent: Thursday, September 20, 2018 11:44 AM

To: Marilyn Walker <mwalker@pffwv.com>

Cc: Gary E. Pullin <gpullin@pffwv.com>; Jayne A. Hudnall <JHudnall@pffwv.com>; Eric Buckner <ebuckner@kksblaw.com>

Subject: RE: Settle v. Stepp - Discovery Requests

Sure, Marilyn. Here you go...

Also, if a protective order is required before you produce documents, please send me a proposed order so we can get the wheels in motion.

Thanks – Russell

Russell A. Williams, Esq.



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From: Marilyn Walker <mwalker@pffwv.com>
Sent: Thursday, September 20, 2018 11:11 AM
To: Russell Williams <RWilliams@kksblaw.com>
Cc: Gary E. Pullin <gpullin@pffwv.com>; Jayne A. Hudnall <JHudnall@pffwv.com>
Subject: Settle v. Stepp - Discovery Requests

Mr. Williams –

Could you please e-mail your client's first discovery requests in Word format to my e-mail mwalker@pffwv.com please.
Thank you in advance.

Marilyn



Marilyn A. Walker
Legal Assistant to
Gary E. Pullin and
Katie Hicklin Luyster
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